

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
WALLID HAMPTON CHIAMAKA WILLIFORD THOMAS MARSHALL	:	VIOLATIONS: 21 U.S.C. § 846 (Conspiracy to distribute “crack” cocaine - 1 count) 21 U.S.C. § 841(a) (Distribution of “crack” cocaine - 7 counts) 21 U.S.C. § 860(a) (Distributing “crack” cocaine within 1,000 feet of a school - 7 counts) 18 U.S.C. § 2 (Aiding and abetting) 21 U.S.C. § 851 (Notice of prior convictions)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From on or about January 31, 2003, to on or about May 15, 2003, in the Eastern District of Pennsylvania, and elsewhere, defendants

WALID HAMPTON
CHIAMAKA WILLIFORD, and
THOMAS MARSHALL

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute more than five grams, that is, approximately 7.59 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II

controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and to knowingly and intentionally distribute more than five grams, that is, approximately 7.33 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property of a school, in violation of Title 21, United States Code, Section 860(a).

MANNER AND MEANS OF THE CONSPIRACY

1. It was a part of the conspiracy that defendant WALID HAMPTON was the leader and organizer of a narcotics distribution enterprise which trafficked in “crack” cocaine in Upper Darby, Pennsylvania.

2. It was further part of the conspiracy that defendants WALID HAMPTON, THOMAS MARSHALL and CHIAMAKA WILLIFORD sold “crack” cocaine and permitted the sale of “crack” cocaine from various locations, including the residence of defendants WALID HAMPTON and THOMAS MARSHALL at 7062 Radbourne Road in Upper Darby, Pennsylvania.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, the following overt acts, among others, were committed in the Eastern District of Pennsylvania:

1. On or about January 31, 2003, defendant CHIAMAKA WILLIFORD sold and caused to be sold “crack” cocaine at 7062 Radbourne Road, Upper Darby, Pennsylvania to a confidential informant (“CI”).

2. On or about February 5, 2003, defendant CHIAMAKA WILLIFORD sold and caused to be sold “crack” cocaine at 7004 Clover Lane in Upper Darby, Pennsylvania to a CI.

3. On or about March 18, 2003, defendant THOMAS MARSHALL sold and caused to be sold “crack” cocaine from his residence at 7062 Radbourne Road in Upper Darby, Pennsylvania to a CI.

4. On or about March 25, 2003, defendants WALID HAMPTON and THOMAS MARSHALL sold and caused to be sold “crack” cocaine near Millbank and Aberdeen Roads in Upper Darby, Pennsylvania to a CI.

5. On or about March 28, 2003, defendant CHIAMAKA WILLIFORD sold and caused to be sold “crack” cocaine near Millbank and Guilford Roads in Upper Darby, Pennsylvania to a CI.

6. On or about April 8, 2003, defendant WALID HAMPTON sold and caused to be sold “crack” cocaine near Millbank and Guilford Roads in Upper Darby, Pennsylvania to a CI.

7. On or about April 9, defendant CHIAMAKA WILLIFORD sold and caused to be sold “crack” cocaine near Millbank and Guilford Roads in Upper Darby, Pennsylvania to a CI.

8. On or about April 17, 2003, defendants WALID HAMPTON and CHIAMAKA WILLIFORD sold and caused to be sold “crack” cocaine near Millbank and Guilford Roads in Upper Darby, Pennsylvania to a CI.

9. On or about May 15, 2003, defendant WALID HAMPTON sold and

caused to be sold “crack” cocaine and heroin near Millbank and Guilford Roads in Upper Darby, Pennsylvania to a CI.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 18, 2003, at Upper Darby, in the Eastern District of
Pennsylvania, defendant

THOMAS MARSHALL

knowingly and intentionally distributed a mixture or substance containing a detectable amount of
cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 18, 2003, at Upper Darby, in the Eastern District of
Pennsylvania, defendant

THOMAS MARSHALL

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Stonehurst Elementary School, a public elementary school located at 7051 Ruskin Lane, Upper Darby, Pennsylvania, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 860(a).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 25, 2003, at Upper Darby, in the Eastern District of
Pennsylvania, defendants

THOMAS MARSHALL and
WALID HAMPTON

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture or
substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled
substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and
Title 18, United States Code, Section 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 25, 2003, at Upper Darby, in the Eastern District of
Pennsylvania, defendants

THOMAS MARSHALL and
WALID HAMPTON

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Stonehurst Elementary School, a public elementary school, located at 7051 Ruskin Lane, Upper Darby, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 28, 2003, at Upper Darby, in the Eastern District of
Pennsylvania, defendant

CHIAMAKA WILLIFORD

knowingly and intentionally distributed a mixture or substance containing a detectable amount of
cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 28, 2003, at Upper Darby, in the Eastern District of
Pennsylvania, defendant

CHIAMAKA WILLIFORD

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Stonehurst Elementary School, a public elementary school located at 7051 Ruskin Lane, Upper Darby, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 860(a).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 8, 2003, at Upper Darby, in the Eastern District of
Pennsylvania, defendant

WALID HAMPTON

knowingly and intentionally distributed a mixture or substance containing a detectable amount of
cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 8, 2003, at Upper Darby, in the Eastern District of
Pennsylvania, defendant

WALID HAMPTON

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Stonehurst Elementary School, a public elementary school located at 7051 Ruskin Lane, Upper Darby, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 860(a).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 9, 2003, at Upper Darby, in the Eastern District of
Pennsylvania, defendant

CHIAMAKA WILLIFORD

knowingly and intentionally distributed a mixture or substance containing a detectable amount of
cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 9, 2003, at Upper Darby, in the Eastern District of
Pennsylvania, defendant

CHIAMAKA WILLIFORD

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Stonehurst Elementary School, a public elementary school located at 7051 Ruskin Lane, Upper Darby, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 860(a).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 17, 2003, at Upper Darby, in the Eastern District of
Pennsylvania, defendants

WALID HAMPTON and
CHIAMAKA WILLIFORD

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture or
substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled
substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and
Title 18, United States Code, Section 2.

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 17, 2003, at Upper Darby, in the Eastern District of
Pennsylvania, defendants

WALID HAMPTON and
CHIAMAKA WILLIFORD

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Stonehurst Elementary School, a public elementary school, located at 7051 Ruskin Lane, Upper Darby, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 15, 2003, at Upper Darby, in the Eastern District of
Pennsylvania, defendant

WALID HAMPTON

knowingly and intentionally distributed a mixture or substance containing a detectable amount of
cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 15, 2003, at Upper Darby, in the Eastern District of
Pennsylvania, defendant

WALID HAMPTON

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Stonehurst Elementary School, a public elementary school located at 7051 Ruskin Lane, Upper Darby, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 860(a).

NOTICE OF PRIOR CONVICTIONS

1. Defendant WALID HAMPTON committed the offenses charged in Counts One, Four, Five, Eight, Nine, Twelve, Thirteen, Fourteen and Fifteen of this Indictment after having been convicted for conspiracy and for the manufacture, delivery and possession with intent to deliver a controlled substance on or about December, 2002, in the Court of Common Pleas of Delaware County, Pennsylvania, Docket Nos. CP 4794-02.

2. Defendant CHIAMAKA WILLIFORD committed the offenses charged in Counts One, Six, Seven, Ten, Eleven, Twelve and Thirteen of this Indictment after having been convicted conspiracy and for the manufacture, delivery and possession with intent to deliver a controlled substance on or about December, 2002, in the Court of Common Pleas of Delaware County, Pennsylvania, Docket No. CP 4796-02.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney